

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ASTRAZENECA AB, AKTIEBOLAGET
HÄSSLE, ASTRAZENECA LP, KBI INC.,
and KBI-E INC.,

Plaintiffs and
Counterclaim-Defendants,
v.

HANMI USA, INC., HANMI
PHARMACEUTICAL CO., LTD., HANMI
FINE CHEMICAL CO., LTD, and HANMI
HOLDINGS CO., LTD.,

Defendants and
Counterclaim-Plaintiffs.

Civil Action No. 3:11-CV-00760-JAP-TJB

Judge Joel A. Pisano
Magistrate Judge Tonianne J. Bongiovanni

**DECLARATION OF PATRICK L. CHEN IN SUPPORT OF PLAINTIFFS' BRIEF IN IN
OPPOSITION TO HANMI'S MOTION *IN LIMINE* NO. 5 (TO PRECLUDE
TESTIMONY OF DR. PAUL BARTLETT AS TO THE STATE OF THE ART
REGARDING GASTRIC ACID RELATED DISEASES)**

I, Patrick L. Chen, hereby declare as follows,

1. I am an associate at the law firm of Fitzpatrick, Cella, Harper & Scinto, 1290 Avenue of the Americas, New York, New York 10104-3800, counsel for Plaintiffs AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc., and KBI-E Inc. in connection with the present action.

2. I make this Declaration on my personal knowledge in support of Plaintiffs' Brief in Opposition to Hanmi's Motion *in limine* No. 5 (To Preclude Testimony of Dr. Paul Bartlett as to the State of the Art Regarding Gastric Acid Related Diseases).

3. Attached as Exhibit 1 is a true and correct copy of the March 25, 2013 Rebuttal Report of Paul A. Bartlett on Validity.

4. Attached as Exhibit 2 is a true and correct copy of Dr. Bartlett's CV.

5. Attached as Exhibit 3 is a true and correct copy of the April 17, 2013 deposition of Dr. Paul A. Bartlett.

6. Attached as Exhibit 4 is a true and correct copy of the March 25, 2013 Rebuttal Report of Dr. David A. Johnson on Validity.

7. Attached as Exhibit 5 is a true and correct copy of the March 25, 2013 Expert Rebuttal Report of René H. Levy, Ph.D.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 6, 2013



Patrick L. Chen